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10 Attorney for John Tam, Jamie Yang,
11 and Corey Fong

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA

15 ACTIVISION PUBLISHING, INC., a)
16 Delaware corporation,) Case No. C 07-03536 MEJ
17)
18) ADMINISTRATIVE MOTION TO FILE
19) UNDER SEAL UNREDACTED MOTION
20) FOR ORDER DETERMINING A GOOD
21) FAITH SETTLEMENT BETWEEN
22) PLAINTIFF AND DEFENDANT JAMIE
23) YANG, AND DECLARATIONS OF JAMIE
24) YANG, RICHARD CAULEY AND YEE-
25) HORN SHUAI
26)
27) DECLARATION OF YEE-HORN SHUAI
28) [filed concurrently herewith] ; AND
29)
30) [PROPOSED] ORDER
31)
32) Date: October 18, 2007
33) Time: 10:00 AM
34) Dept.: Courtroom B, 15th Fl.
35) Judge: Honorable Maria-Elena James

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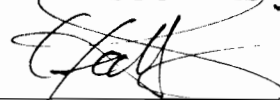
41 Pursuant to Civil Local Rule 79-5, Defendant Jamie Yang (hereinafter "Yang") hereby
42 submit her Administrative Motion to File Under Seal Their unredacted Motion for Order
43 Determination Good Faith Settlement between Plaintiff and Jamie Yang (Motion), Declarations
44 of Jamie Yang, Richard Cauley and Yee-Horn Shuai (Declarations); because those documents
45 contain information regarding confidential settlement agreements entered into by and between
46 the parties, as well as confidential financial information, such as salary information, that must
47 remain confidential in order to protect the privacy of the individual.

48 The parties have all agreed to maintain the confidentiality of said information, and thus

1 the Tam Defendants respectfully request that the unredacted Motion , Reply and the Declarations
2 1 and 2 be filed under seal.

3 Dated: September 5, 2007

SHUAI & ASSOCIATES



Yee-Horn Shuai, Attorney for defendants
John Tam, Corey Fong and Jamie Yang

8 **IT IS SO ORDERED:**

10 Dated: _____

Honorable Maria Elena James
Judge of the United States District Court

Yee-Horn Shuai, Esq.
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Attorney for John Tam, Jamie Yang,
and Corey Fong

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ACTIVISION PUBLISHING, INC., a
Delaware corporation,

Plaintiff,

vs.

JOHN TAM, an individual, JAMIE YANG, an
individual, et al.,

Defendants.

) Case No. C 07-03536 MEJ

) DECLARATION OF YEE-HORN SHUAI IN
) SUPPORT OF ADMINISTRATIVE
) MOTION TO FILE UNDER SEAL

) Date: October 18, 2007
) time: 10:00 AM
) Dept.: Courtroom B, 15th Floor
) Judge: Maria Elena James

I, Yee-Horn Shuai, hereby declare as follows:

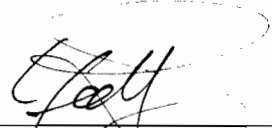
1. I am an attorney at the law firm of Shuai & Associates, attorneys for the defendant John Tam, Jamie Yang and Corey Fong (hereinafter collectively "Tam Defendants"). I make this declaration in support of Defendant Jamie Yang's Administrative Motion to File Under Seal. I have personal knowledge of the following, and if called upon as a witness, I could and would competently testify thereto.

2. The Motion for Order Determining Good Faith Settlement between Plaintiff and Defendant Jamie Yang ("Motion") and the Declarations Jamie Yang, Richard Cauley and Yee-Horn Shuai ("Declarations"), contain information regarding confidential settlement agreement entered into by and between the parties, as well as confidential financial information, such a personal financial conditions information, that must remain confidential in order to protect the privacy of the individual. The parties to this lawsuit have all agreed to maintain the

1 confidentiality of said information, and have designated the documents attached as Exhibits A
2 and B to the Declaration to Richard Cauley as being confidential, pursuant to the Joint Stipulated
3 Protective Order signed by all of the parties and so ordered by the United States Magistrate Judge
4 on January 31, 2007.

5 I certify and declare under penalty of perjury under the laws of the State of California that
6 the forgoing is true and correct.

7 Dated this 5th day of September 2007, at Pasadena, California.

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11 Yee-Horn Shuai, Declarant
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